



FEC Electronic Filing Office
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DEC 23, 1999

MEMO

TO: Software vendors supporting federal committees

FROM: FEC Electronic Filing Office

SUBJECT: Electronic filing process and format evaluation and new filing regulations

In September, the President signed into law PL 106-58, which requires committees to file electronically if they exceed, or expect to exceed activity thresholds to be determined by the FEC. Beginning in 2001, when this law goes into effect, we expect a significant increase in electronic filing activity. In order to be well prepared for the expected increase the electronic filing system is undergoing a review process. The file format, procedures and software tools will all be carefully scrutinized. We also intend to create a clearly defined framework by which software vendors may have their software tested and evaluated by the FEC so that filers not only know which software has passed evaluation but what, in real terms, passing evaluation means.

Because you as software vendors will be impacted significantly by format changes or evaluation requirements it is important that you be given the opportunity to participate in the creation of standards and format adjustments in a way that fosters a dynamic and inclusive relationship with the Commission. Some of you have had a great deal of experience in the last year incorporating electronic filing into your software and dealing with the challenges involved in supporting the process in various installation environments. We would like you to share your experiences with us so that we may use them to fine-tune and adjust the format and processes to make the system easier for both filers and developers.

Included here are a few specific questions about the current electronic filing process, please answer the questions and return them as quickly as possible. This will enable us to create a framework from which to develop the next revision of the electronic filing system and to define a formal working relationship between the Commission and the vendor community. The information will also be used to prepare for a forum to be held in Washington DC in the near future to which all vendors will be invited.

The Questions:

1. How could the electronic file format be improved to make the reporting process easier? Unique identifiers, long description fields and transactions that relate multiple entities are examples of subjects of interest.
2. How could the FEC software modules FECheck and FECLoad be improved or changed to make development and use easier?
3. What form might a software approval process take so that software provided to federal committees is as well tested as possible? The key here is that any expressed or implied “approval stamp” from the FEC for a software product must indicate to potential users of that product that it **WILL** perform properly and be supported in an exemplary fashion.
4. With the goal of increasing the number of electronic filers as much as possible before the 2001 cycle, what steps could the FEC take to aid software developers in increasing the number of electronic filers among their clients?
5. How might the system be altered to better accommodate security issues such as firewalls and proxy servers? The current system is based on using the Disklose protocol on port 667. Other possible options might be Port 443 with SSL or Disklose on port 80.
6. How might the amendment process be improved? Currently individual transactions are marked as changed, not changed, deleted or added and the entire report is resubmitted.
7. Please include any other suggestions you have that would improve the electronic filing system or make it easier to incorporate or support electronic filing.